

EXHIBIT A

Interim Fee Applications

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LEAR CAPITAL, INC.,¹

Debtor.

Chapter 11 (Subchapter V)

Case No. 22-10165 (BLS)

Re: Docket Nos. 400, 401, 402, 403, 404, 405, 406, 407

**INDEX OF SECOND INTERIM FEE APPLICATIONS TO BE
CONSIDERED AT THE HEARING NOVEMBER 16, 2022 AT 11:00 A.M. (ET)**

**Shulman Bastian Friedman & Bui LLP
Bankruptcy Counsel to the Debtor**

1. Second Interim Fee Application of Shulman Bastian Friedman & Bui LLP, Bankruptcy Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From June 1, 2022 through August 31, 2022 [Filed October 17, 2022; Docket No. 400].

Objection Deadline: November 1, 2022 at 4:00 p.m. (ET).

Responses/Objections Received:

- A. Informal Comments for the Office of the United States Trustee (the “U.S. Trustee”).

Related Documents:

- A. Fourth Monthly Fee Application of Shulman Bastian Friedman & Bui LLP, Bankruptcy Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From June 1, 2022 through June 30, 2022 [Filed July 15, 2022; Docket No. 276].
- B. Certificate of No Objection Regarding Fourth Monthly Fee Application of Shulman Bastian Friedman & Bui LLP, Bankruptcy Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From June 1, 2022 through June 30, 2022 [Filed July 26, 2022; Docket No. 290].

¹ The last four digits of the Debtor’s federal tax identification number are 7197. The Debtor’s address is 1990 S. Bundy Drive, Suite 600, Los Angeles CA 90025.

- C. Fifth Monthly Fee Application of Shulman Bastian Friedman & Bui LLP, Bankruptcy Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From July 1, 2022 through July 31, 2022 [Filed August 15, 2022; Docket No. 319].
- D. Certificate of No Objection Regarding Fifth Monthly Fee Application of Shulman Bastian Friedman & Bui LLP, Bankruptcy Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From July 1, 2022 through July 31, 2022 [Filed August 26, 2022; Docket No. 328].
- E. Sixth Monthly Fee Application of Shulman Bastian Friedman & Bui LLP, Bankruptcy Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From August 1, 2022 through August 31, 2022 [Filed September 15, 2022; Docket No. 355].
- F. Certificate of No Objection Regarding Sixth Monthly Fee Application of Shulman Bastian Friedman & Bui LLP, Bankruptcy Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From August 1, 2022 through August 31, 2022 [Filed September 27, 2022; Docket No. 369].
- G. Certification of Counsel Regarding Second Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered and for Reimbursement of Expenses [Filed November 3, 2022; Docket No. 423].

**Morris James LLP
Counsel to the Debtor**

- 2. Second Interim Application of Morris James LLP, as Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From May 1, 2022 through August 31, 2022 [Filed October 17, 2022; Docket No. 401].

Objection Deadline: November 1, 2022 at 4:00 p.m. (ET).

Responses/Objections Received:

- A. Informal Comments for the Office of the U. S. Trustee.

Related Documents:

- A. Third Monthly Application of Morris James LLP, Co-Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From May 1, 2022 to May 31, 2022 [Filed September 6, 2022; Docket No. 344].

- B. Certificate of No Objection Regarding Third Monthly Application of Morris James LLP, Co-Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From May 1, 2022 to May 31, 2022 [Filed September 19, 2022; Docket No. 358].
- C. Fourth Monthly Application of Morris James LLP, Co-Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From June 1, 2022 to June 30, 2022 [Filed September 15, 2022; Docket No. 352].
- D. Certificate of No Objection Regarding Fourth Monthly Application of Morris James LLP, Co-Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From June 1, 2022 to June 30, 2022 [Filed September 27, 2022; Docket No. 366].
- E. Fifth Monthly Application of Morris James LLP, Co-Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From July 1, 2022 to July 31, 2022 [Filed September 15, 2022; Docket No. 353].
- F. Certificate of No Objection Regarding Fifth Monthly Application of Morris James LLP, Co-Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From July 1, 2022 to July 31, 2022 [Filed September 27, 2022; Docket No. 367].
- G. Fifth Monthly Application of Morris James LLP, Co-Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From August 1, 2022 to August 31, 2022 [Filed September 15, 2022; Docket No. 354].
- H. Certificate of No Objection Regarding Fifth Monthly Application of Morris James LLP, Co-Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From August 1, 2022 to August 31, 2022 [Filed September 27, 2022; Docket No. 368].
- I. Certification of Counsel Regarding Second Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered and for Reimbursement of Expenses [Filed November 3, 2022; Docket No. 423].

The Cook Law Firm, P.C.
Special Insurance Counsel to the Debtor

- 3. Second Interim Application of The Cook Law Firm, P.C., as Special Insurance Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From June 1, 2022 through August 31, 2022 [Filed October 17, 2022; Docket No. 402].

Objection Deadline: November 1, 2022 at 4:00 p.m. (ET).

Responses/Objections Received: None.

Related Documents:

- A. Fourth Monthly Application of The Cook Law Firm, P.C., as Special Insurance Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From June 1, 2022 through June 30, 2022 [Filed August 1, 2022; Docket No. 292].
- B. Certificate of No Objection Regarding Fourth Monthly Application of The Cook Law Firm, P.C., as Special Insurance Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From June 1, 2022 through June 30, 2022 [Filed August 12, 2022; Docket No. 315].
- C. Fifth Monthly Application of The Cook Law Firm, P.C., as Special Insurance Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From July 1, 2022 through July 31, 2022 [Filed August 15, 2022; Docket No. 320].
- D. Certificate of No Objection Regarding Fifth Monthly Application of The Cook Law Firm, P.C., as Special Insurance Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From July 1, 2022 through July 31, 2022 [Filed August 26, 2022; Docket No. 329].
- E. Sixth Monthly Application of The Cook Law Firm, P.C., as Special Insurance Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From August 1, 2022 through August 31, 2022 [Filed September 15, 2022; Docket No. 356].
- F. Certificate of No Objection Regarding Sixth Monthly Application of The Cook Law Firm, P.C., as Special Insurance Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From August 1, 2022 through August 31, 2022 [Filed September 27, 2022; Docket No. 370].
- G. Certification of Counsel Regarding Second Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered and for Reimbursement of Expenses [Filed November 3, 2022; Docket No. 423].

Mitchell Silberberg & Knupp LLP
Special Litigation and Corporate Counsel to the Debtor

- 4. Second Interim Fee Application of Mitchell Silberberg & Knupp LLP, Special Litigation and Corporate Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period June 1, 2022 through August 31, 2022 [Filed October 17, 2022; Docket No. 403].

Objection Deadline: November 1, 2022 at 4:00 p.m. (ET).

Responses/Objections Received:

- A. Informal Comments for the Office of the U. S. Trustee.

Related Documents:

- A. First Monthly Fee Application of Mitchell Silberberg & Knupp LLP, Special Litigation and Corporate Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From June 1, 2022 to June 30, 2022 [Filed August 4, 2022; Docket No. 295].
- B. Certificate of No Objection Regarding First Monthly Fee Application of Mitchell Silberberg & Knupp LLP, Special Litigation and Corporate Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From June 1, 2022 to June 30, 2022 [Filed August 16, 2022; Docket No. 324].
- C. Second Monthly Fee Application of Mitchell Silberberg & Knupp LLP, Special Litigation and Corporate Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From June 1, 2022 to June 30, 2022 [Filed September 8, 2022; Docket No. 345].
- D. Certificate of No Objection Regarding Second Monthly Fee Application of Mitchell Silberberg & Knupp LLP, Special Litigation and Corporate Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From June 1, 2022 to June 30, 2022 [Filed September 22, 2022; Docket No. 365].
- E. Third Monthly Fee Application of Mitchell Silberberg & Knupp LLP, Special Litigation and Corporate Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From July 1, 2022 to July 31, 2022 [Filed October 12, 2022; Docket No. 388].
- F. Certificate of No Objection Regarding Third Monthly Fee Application of Mitchell Silberberg & Knupp LLP, Special Litigation and Corporate Counsel to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From July 1, 2022 to July 31, 2022 [Filed October 25, 2022; Docket No. 416].
- G. Certification of Counsel Regarding Second Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered and for Reimbursement of Expenses [Filed November 3, 2022; Docket No. 423].

Paladin Management Group, LLC
Financial Advisor to the Debtor

5. Second Interim Application of Paladin Management Group, LLC for Allowance of Compensation for Services Rendered and Reimbursement of Expenses as Financial Advisor to the Debtor for the Period June 1, 2022 through August 31, 2022 [Filed October 17, 2022; Docket No. 404].

Objection Deadline: November 1, 2022 at 4:00 p.m. (ET).

Responses/Objections Received:

- A. Informal Comments for the Office of the U. S. Trustee.

Related Documents:

- A. Fourth Monthly Fee Application of Paladin Management Group, LLC Financial Advisor to the Debtor, for Allowance of Compensation and Reimbursement of Expenses as for the Period June 1, 2022 through June 30, 2022 [Filed August 1, 2022; Docket No. 291].
- B. Certificate of No Objection Regarding Fourth Monthly Fee Application of Paladin Management Group, LLC Financial Advisor to the Debtor, for Allowance of Compensation and Reimbursement of Expenses as for the Period June 1, 2022 through June 30, 2022 [Filed August 12, 2022; Docket No. 314].
- C. Fifth Monthly Fee Application of Paladin Management Group, LLC Financial Advisor to the Debtor, for Allowance of Compensation and Reimbursement of Expenses as for the Period July 1, 2022 through July 31, 2022 [Filed September 1, 2022; Docket No. 337].
- D. Certificate of No Objection Regarding Fifth Monthly Fee Application of Paladin Management Group, LLC Financial Advisor to the Debtor, for Allowance of Compensation and Reimbursement of Expenses as for the Period July 1, 2022 through July 31, 2022 [Filed September 14, 2022; Docket No. 349].
- E. Sixth Monthly Fee Application of Paladin Management Group, LLC Financial Advisor to the Debtor, for Allowance of Compensation and Reimbursement of Expenses as for the Period August 1, 2022 through August 31, 2022 [Filed September 30, 2022; Docket No. 376].
- F. Certificate of No Objection Regarding Sixth Monthly Fee Application of Paladin Management Group, LLC Financial Advisor to the Debtor, for Allowance of Compensation and Reimbursement of Expenses as for the Period August 1, 2022 through August 31, 2022 [Filed October 12, 2022; Docket No. 391].

- G. Certification of Counsel Regarding Second Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered and for Reimbursement of Expenses [Filed November 3, 2022; Docket No. 423].

Baker Tilly US, LLP
Accountants to the Debtor

6. Combined Second Consolidated Monthly and Second Interim Fee Application of Baker Tilly US, LLP, Accountants to the Debtor, for Allowance of Compensation and Reimbursement of Expenses for the Period From June 1, 2022 to August 31, 2022 [Filed October 17, 2022; Docket No. 405].

Objection Deadline: November 1, 2022 at 4:00 p.m. (ET).

Responses/Objections Received: None.

Related Documents:

- A. Certification of Counsel Regarding Second Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered and for Reimbursement of Expenses [Filed November 3, 2022; Docket No. 423].

BMC Group, Inc.
Administrative Advisor to the Debtor

7. Second Interim Application for Compensation and Reimbursement of Expenses of BMC Group, Inc., as Administrative Agent for the Debtor for the Period From June 1, 2022 through August 31, 2022 [Filed October 17, 2022; Docket No. 406].

Objection Deadline: November 1, 2022 at 4:00 p.m. (ET).

Responses/Objections Received: None.

Related Documents:

- A. Combined Third Monthly Application for Compensation and Reimbursement of Expenses of BMC Group, Inc., as Administrative Agent for the Debtor for the Period From June 1, 2022 through July 31, 2022 [Filed August 22, 2022; Docket No. 325].
- B. Certificate of No Objection Regarding Fourth Monthly Application for Compensation and Reimbursement of Expenses of BMC Group, Inc., as Administrative Agent for the Debtor for the Period From June 1, 2022 through July 31, 2022 [Filed September 22, 2022; Docket No. 343].

- C. Third Monthly Application for Compensation and Reimbursement of Expenses of BMC Group, Inc., as Administrative Agent for the Debtor for the Period From August 1, 2022 through August 31, 2022 [Filed September 29, 2022; Docket No. 375].
- D. Certificate of No Objection Regarding Fourth Monthly Application for Compensation and Reimbursement of Expenses of BMC Group, Inc., as Administrative Agent for the Debtor for the Period From August 1, 2022 through August 31, 2022 [Filed October 12, 2022; Docket No. 390].
- E. Certification of Counsel Regarding Second Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered and for Reimbursement of Expenses [Filed November 3, 2022; Docket No. 423].

Potter Anderson & Corroon LLP
Counsel to the Committee of Customers

- 8. First Interim Combined Application of Potter Anderson & Corroon LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Committee of Customers of Lear Capital, Inc. for the Period July 20, 2022 Through August 31, 2022 [Filed October 18, 2022; Docket No. 407].

Objection Deadline: November 1, 2022 at 4:00 p.m. (ET).

Responses/Objections Received:

- A. Informal Comments for the Office of the U. S. Trustee.

Related Documents:

- A. Combined First Monthly Application of Potter Anderson & Corroon LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Committee of Customers of Lear Capital, Inc. for the Period July 20, 2022 Through August 31, 2022 [Filed September 16, 2022; Docket No. 357].
- B. Certificate of No Objection Regarding Combined First Monthly Application of Potter Anderson & Corroon LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Committee of Customers of Lear Capital, Inc. for the Period July 20, 2022 Through August 31, 2022 [Filed September 27, 2022; Docket No. 371].
- C. Certification of Counsel Regarding Second Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered and for Reimbursement of Expenses [Filed November 3, 2022; Docket No. 423].

Dated: November 7, 2022

MORRIS JAMES LLP

/s/ Brya M. Keilson

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